

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Case No. 23-mj-688 (JFD)

IN THE MATTER OF THE CRIMINAL  
COMPLAINT OF AVONT AKIRA  
DRAYTON

**SEALED BY ORDER OF THE COURT**

**AFFIDAVIT OF CALEB HOISINGTON**

I, Caleb Hoisington, being duly sworn, depose and state that:

**INTRODUCTION**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so employed since March 2020. I currently am assigned to the St. Paul Field Office. In my capacity as an ATF Special Agent, I have participated in criminal investigations of individuals and entities related to violations of federal law, particularly those involving firearms, narcotics, and explosives. I also work with various law enforcement agencies and drug task forces throughout the State and District of Minnesota and have collectively participated in hundreds of investigations and arrests involving firearms and controlled substances violations.

2. I have completed the Basic Criminal Investigator's Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia, where I have been trained to investigate criminal matters under Federal jurisdiction. I have successfully completed courses in criminal investigations, tactical training in executing searches of persons and premises, courses in federal firearms violations, and other general investigative matters. I have received significant amounts of training on the subject matter within the ATF's jurisdiction at the Special Agent

Basic Training academy, including courses in criminal investigations, federal firearms violations, federal arson laws, and federal explosives laws. I received a Bachelor of Arts degree in History from the University of Northwestern in St. Paul, MN in May 2012.

3. I am an investigator or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7) because my position is empowered by law to conduct investigations and make arrests for offenses enumerated in Title 18, United States Code, Section 2516. I also am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C) because I am a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

4. This affidavit is submitted in support of a criminal complaint charging **AVONT AKIRA DRAYTON** (YOB 2001) with Unlawful Possession of a Machinegun, in violation of Title 18, United States Code, Section 922(o)(1).

5. Because this affidavit is being submitted for the limited purpose of establishing probable cause to secure a search warrant, I have not included every fact in this investigation known to me and to others. This affidavit is based upon, among other things, my personal knowledge, information provided to me by other law enforcement agents and investigators, my review of records, interviews of witnesses, and my training and experience.

**FACTS SUPPORTING PROBABLE CAUSE**

6. On or about March 14, 2023, an investigator with the Central Minnesota Violent Offender Task Force (CMVOTF) notified ATF of a Snapchat group named “BLICCS&STICCS3.” CMVOTF suspected the Snapchat group was used to facilitate the trafficking of machineguns, firearms, and controlled substances in the Twin Cities and outlying areas. CMVOTF provided ATF with screenshots and videos of several individuals selling, promoting, and operating machinegun conversion devices (MCD) that convert a semi-automatic firearm—either a pistol or a rifle—into a fully automatic machinegun. The ATF has classified MCDs as machineguns and such devices and firearms are regulated under the National Firearms Act (NFA).

7. A law enforcement officer was invited into “BLICCS&STICCS3” by a confidential informant (CI) and began monitoring the group in an undercover capacity. Between March and June 2023, undercover law enforcement officers have conducted six controlled buys with multiple members of the “BLICCS&STICCS3” Snapchat group, including **DRAYTON**.

8. On or about April 13, 2023, undercover law enforcement officers met with a known Snapchat member of the “BLICCS&STICCS3” group to purchase a 3D-printed drop-in MCD for an AR-style rifle for \$550. This user had a Snapchat username of “messyoy” and a vanity name of “Southside\_bae.” The purchase of the 3D-printed drop-in MCD from “Southside\_bae” was established and organized by Rafael WESLEY (YOB 2004)—another known member of the Snapchat group—and the undercover officers through their respective SnapChat accounts. Law

enforcement subsequently identified Snapchat user “Southside\_bae” as Avont **DRAYTON** (YOB: 2001).

9. Specifically, on April 13, 2023, the undercover law enforcement officers received a phone call from **WESLEY** to discuss the precise location of the meetup. The call was a three-way call with **DAYTON** also on the line. It was through this three-way call on April 13, 2023, that law enforcement officers initially identified **DRAYTON**’s phone number as (612) 532-9834. Law enforcement officers subsequently confirmed this number as associated with **DRAYTON** through law enforcement databases and subscriber information.

10. During the April 13, 2023, transaction, law enforcement officers successfully met with **DRAYTON**, who showed law enforcement officers a video on his phone of **DRAYTON** shooting a firearm with a drop-in MCD inserted, which made the firearm fully automatic. **DRAYTON** commented that the drop-in shot “way too fucking fast” and recommended that the undercover officers get a heavy buffer spring to slow the firing rate down but still “shoot fully.”



*Fig. 4: 3D-printed drop-in MCD  
purchased from **DRAYTON**  
on April 13, 2023*

11. Following the April 13, 2023 purchase of the drop-in MCD, undercover law enforcement officers remained in contact with **DRAYTON** on Snapchat. These communications specifically included the possibility of purchasing another drop-in MCD for an AR-style rifle. On or about May 11, 2023, an undercover officer met with **DRAYTON** to purchase two drop-in MCDs for \$800. However, when **DRAYTON** arrived at the deal in Eagan, MN and met with the undercover officer, he stated that he had only had time to get one MCD and would sell it for \$400. The undercover officer provided **DRAYTON** \$400 in prerecorded funds in exchange for the drop-in MCD:



*Fig. 2: 3D printed drop-in MCD  
purchased from **DRAYTON**  
on May 11, 2023*

12. On June 9, 2023, undercover law enforcement officers met with **DRAYTON** to purchase a Glock pistol and a “switch” for \$1,300. **DRAYTON** arrived at the agreed upon location and provided the pistol and switch. **DRAYTON** explained that he had removed the “switch” from the firearm and stored it in his sock in case he got pulled over on the way to the transaction. The undercover law

enforcement officers ultimately purchased a .45 caliber Glock model 30S semi-automatic pistol bearing serial number BEVH917 and detached Glock “switch” from **DRAYTON** for \$1,300 in pre-recorded funds:



*Fig. 3: Glock 30S and disassembled gold Glock “switch” purchased from **DRAYTON** on June 9, 2023*

13. After the June 9, 2023 deal, law enforcement officers followed the vehicle **DRAYTON** used back to 12501 Portland Avenue South in Burnsville, Minnesota. The law enforcement officers observed the vehicle park on Portland Avenue just to the west of the apartment building. The vehicle parked in front of a first-floor apartment.

14. Importantly, although **DRAYTON** does not have a prohibiting prior felony conviction, he has numerous prior misdemeanor convictions and was subject to terms of judicial supervision at the time of these interactions. Notably, on March 16, 2023, **DRAYTON** was convicted of a gross misdemeanor in Hennepin County, Minnesota, for carrying and possessing a pistol without a permit. Upon information and belief, the terms of **DRAYTON**’s judicial supervision prohibit him from possessing firearms of any kind. **DRAYTON** provided the address of 12501 Portland

Avenue South, Apartment 118, Burnsville, Minnesota, as his registered address of judicial supervision.

15. Law enforcement officers sent ATF's Firearms and Technology Division (FATD) photographs of the drop-in MCDs purchased from DRAYTON on April 13, 2023, and May 11, 2023. FATD conducted a preliminary review of the devices and determined the devices appeared to be "common machinegun conversion devices." FATD further explained that such devices "are made from a 3D printed material (and sometimes made from metal) and are designed and intended solely and exclusively for converting a semiautomatic AR-type firearm to shoot automatically." Additionally, "an AR-type machinegun conversion device can be a part, or combination of parts, designed and intended for use in converting a semiautomatic weapon into a machinegun; therefore, such an item is a machinegun as defined in 26 U.S.C. § 5845(b)."

16. FATD also provided a preliminary determination of the "switch" purchased from Drayton on or about June 9, 2023. FATD's preliminary review concluded that the purchased "switch" qualified as a Glock conversion device, and explained "a Glock conversion device is a part, or combination of parts, designed and intended for use in converting a semiautomatic Glock pistol into a machinegun; therefore, it is a "machinegun" as defined in 26 U.S.C. § 5845(b) . . . These devices are commonly referred to as "Glock switches" and "Glock Auto Sears."

17. On approximately June 14, 2023, the United States District Court for the District of Minnesota issued a search warrant for DRAYTON's SnapChat to

further investigate **DRAYTON's** dealings with firearms (23-mj-486 DTS). I began reviewing the results from the search warrant shortly after receiving the data back from SnapChat.

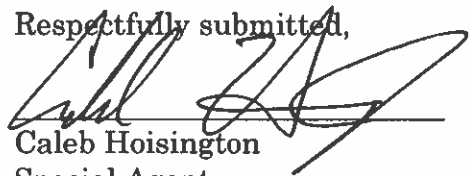
18. **DRAYTON's** SnapChat account contained numerous videos and photos of what appear to be **DRAYTON** shooting, possessing, and advertising the sale of various firearms, including several privately made firearms (PMF) commonly referred to as “ghost guns” along with a large array of “switches,” both attached and detached from the firearms. Notably, on or about August 29, 2023, **DRAYTON** was Hennepin County, Minnesota, for allegedly possessing a PMF.



**CONCLUSION**

19. Based on the foregoing, there is probable cause to believe that **Avont Akira Drayton** committed the offense of Unlawful Possession of a Machinegun, in violation of Title 18, United States Code, Section 922(o)(1), as further described in attached criminal complaint.

Respectfully submitted,



Caleb Hoisington  
Special Agent

Bureau of Alcohol, Tobacco, Firearms  
& Explosives

SUBSCRIBED AND SWORN TO before me  
by reliable electronic means via FaceTime  
and email pursuant to Fed. R. Crim. P. 41(d)(3)  
on September 13, 2023.



The Honorable John F. Docherty  
United States Magistrate Judge